

# Exhibit 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>STEPHEN McCOLLUM, <i>et al.</i>,</b>	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	<b>CIVIL ACTION NO. 3:12-CV-02037</b>
<b>BRAD LIVINGSTON, <i>et al.</i>,</b>	§	
<i>Defendants.</i>	§	

**DEFENDANT UTMB'S DESIGNATION OF EXPERTS**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Defendant, The University of Texas Medical Branch, by and through its attorney of record, the Attorney General of the State of Texas, and files this Designation of experts.

1. Glenda Adams, M.D.,  
Sr. Medical Director Inpatient Services  
200 River Pointe  
Suite 200  
Conroe, Texas 77304  
512-475-2335 c/o Kim Coogan

Dr. Adams will testify about the medical care provided to Mr. McCollum, policies and procedures of UTMB Correctional Managed Care, activities of the Correctional Managed Care committee. She will testify regarding those issues discussed in her deposition and expert report, attached.

2. Ananda D. Babbili, PA  
Hutchins State Jail  
1500 E. Langdon Rd.  
Dallas TX 75241  
972-225-1304 x 6266

Mr. Babbili will testify about the medical care provided to Mr. McCollum at the Hutchins unit as well as a review of the records from McLennan County.

3. Tito Orig, M.D.  
Hutchins State Jail  
1500 E. Langdon Rd.  
Dallas TX 75241  
972-225-1304 x 6266  
972-225-8355 (fax)

Dr. Orig may testify about the medical care provided to Mr. McCollum at the Hutchins unit as well as a review of the records from McLennan County.

4. Keith Pinckard, M.D.  
Medical Examiner  
Southwestern Institute of Forensic Sciences  
Dallas, Texas

Dr. Pinckard performed the autopsy of Mr. McCollum.

5. Dr. Owen Murray  
University of Texas Medical Branch, Galveston  
Vice President For Offender Health Services  
936-494-4171 (office)

Dr. Murray is a physician and Vice President for Offender Services at UTMB. He is a non-retained witness who may testify about services provided by UTMB Correctional Managed Care and policies of the Correctional Managed Health Care Committee, particularly as they relate to the providing of medical care to inmates incarcerated at TDCJ. Dr. Murray may testify about the contract between UTMB and Correctional Managed Health Care Committee. He may also testify about those matters discussed during his deposition.

6. Lannette Linthicum, M.D.  
TDCJ Division Director for Health Services  
Two Financial Plaza, Suite 625  
Huntsville, Texas 77340  
936-473-3535

Dr. Linthicum is a physician and TDCJ Division Director for Health Services. She is a non-retained, non-party witness who may testify about the policies of the Correctional Managed Health Care Committee, particularly as they relate to the providing of medical care to inmates incarcerated at TDCJ. She may testify about the contract between UTMB and Correctional Managed Health Care Committee. She may also talk about the duties of the TDCJ Health Services Division.

7. Phyllis McWorter, R.N.  
TDCJ Health Services Liasion  
Two Financial Plaza, Suite 625  
Huntsville, Texas 77340

936-473-3589

Ms. McWorter is a non-party, non-retained witness who may testify about the policies of the TDCJ Health Services Division as they relate to the housing placement of offenders in response to their disabilities or special needs.

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

DAVID C. MATTAX  
Deputy Attorney General for  
Defense Litigation

KAREN D. MATLOCK  
Assistant Attorney General  
Chief, Law Enforcement Defense Division

/s/KIM COOGAN  
KIM COOGAN  
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**ATTORNEYS FOR DEFENDANT  
UNIVERSITY OF TEXAS MEDICAL BRANCH**

**NOTICE OF ELECTRONIC FILING**

I, KIM COOGAN, Assistant Attorney General of Texas, certify that I have electronically submitted for filing **Defendant UTMB's Designation of Experts** to the Court, on January 15, 2014 in the Northern District of Texas, Dallas Division.

/s/ KIM COOGAN  
**KIM COOGAN**  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, KIM COOGAN, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Defendant UTMB's Designation of Experts** has been served by placing same in the United States Mail on this the 15th day of January, 2014, addressed to:

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Scott Medlock  
The Edwards Law Firm  
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/s/KIM COOGAN  
**KIM COOGAN**  
Assistant Attorney General